

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BOBBY RICHARDSON,

Plaintiff,

v.

VILLAGE OF DOLTON, OFFICER CARR  
#104, OFFICER BIDDINGS #134, and  
ENRIQUE HERRERA,

Defendants.

Court No.: 20 cv 4254

Honorable Virginia M. Kendall

**DEFENDANT'S UNOPPOSED MOTION  
FOR EXTENSION OF DISCOVERY SCHEDULE**

Defendants, VILLAGE OF DOLTON and OFFICERS PATRICK CARR, #104, CAMERON BIDDINGS, #134, and ENRIQUE HERRERA, by and through his attorneys, ShawnTe Raines of Ancel Glink, P.C., moves this Court to extend thse discovery schedule. In support of this unopposed motion, defendant states as follows:

1. On July 20, 2020, Plaintiff Bobby Richardson filed his Complaint against the Village of Dolton and Officers Patrick Carr, #104, Cameron Biddings, #134, and Unknown Officer. [Doc. 1]

2. On March 29, 2021 Plaintiff filed his Amended Complaint naming the Unknown Officer as Enrique Herrera. [Doc. 21]

3. Fact discovery was set to close on April 15, 2021 in this matter. The Parties requested an extension of time to complete fact discovery. [Doc. 22 & 23]

4. Fact discovery was then set to close on June 14, 2021.

5. Following the April elections, the village implemented administrative changes and appointed Ancel Glink as village attorney.

6. On May 26, 2021, Attorney Emanuel C. Welch and ShawnTe Raines of Ancel Glink P.C., filed an appearance to represent the Defendants. [Doc. 31-32]

7. The parties respectfully request an extension of the discovery cut-off for the purpose of completing written discovery served upon defendant Herrera and completing his deposition.

8. The parties anticipate completing written by July 14, 2021 and completing the deposition by July 31, 2021.

9. This discovery extension is therefore necessary for the parties to complete necessary work in this litigation.

10. This motion is brought in good faith and will not prejudice any party.

WHEREFORE, the parties respectfully request that this Court grant its motion for an extension of time up to and including July 31, 2021 to complete fact discovery.

Respectfully Submitted,

VILLAGE OF DOLTON; ET AL.

/s/ ShawnTe Raines

SHAWNTE RAINES/ ARDC # 6300624

One of the attorneys for Defendants

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2021, I electronically filed the foregoing Defendants' Unopposed Motion for Extension of the Discovery Schedule with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

Jeanette Samuels

sam@spjlaw.com

/s/ ShawnTe Raines

SHAWNTE RAINES / ARDC # 6300624

One of the attorneys for Defendants

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